

**REMARKS**

Claims 1 through 20 are pending in this Application. Independent claims 1, 4 and 5 and dependent claim 17 have been amended. Care has been exercised to avoid the introduction of new matter. Adequate descriptive support for the present Amendment should be apparent throughout the originally filed disclosure. Applicants submit that the present Amendment does not generate any new matter issue.

**The Examiner objected to the drawings under 37 C.F.R. § 1.83(a) with respect to the limitations of claim 17.**

**The Examiner objected to the specification for lack of proper antecedent basis for the subject matter defined in claim 17.**

**Claim 17 was rejected under the second paragraph of 35 U.S.C. § 112.**

The above drawing objection, the above objection to the specification, and the above rejection of claim 17 under the second paragraph of 35 U.S.C. § 112 are traversed. Indeed, the above objections and rejection have been rendered moot by deleting the limitation in claim 17 underpinning the objections and rejection. Accordingly, withdrawal of the drawing objection, withdrawal of the objection to the disclosure and withdrawal of the rejection of claim 17 under the second paragraph of 35 U.S.C. § 112 are solicited.

**Claims 1 through 3, 5, 6, 8, 18 and 20 were rejected under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama.**

In the statement of the rejection the Examiner concluded that one having ordinary skill in the art would have been motivated to modify the apparatus of Huang et al. by implementing the stacking technique of Kuriyama. This rejection is traversed.

Each of independent claims 1 and 5 is directed to an apparatus comprising a pixel circuit, display control circuit, and supply region which are stacked such that at least one of a data line transmitting luminance data and a selection line transmitting a write timing signal for the luminance data, are connected to the display control circuit and overlaps with the supply region in a stacking direction. No such structure is disclosed by Huang et al. and certainly not by Kuriyama. Simply put Kuriyama neither discloses nor suggests the concept of stacking a data line transmitting luminance data or a selection line transmitting a write timing signal for the luminance data so as to overlap with a power supply line.

Applicants would stress that the above argued difference between the claimed inventions and the applied prior art is functionally significant. Specifically, in accordance with the present invention, various signal lines and power supply lines are formed in a stacking direction. Significantly, capacitance between lines resulting from stacking a data line transmitting luminance data and a power supply line reduces the adverse impact of noise and static electricity on the signals, thereby improving display. This notion is neither disclosed nor suggested by either of the applied references.

Based upon the foregoing it should be apparent the even if the applied references are combined as suggested by the Examiner, and Applicants do not agree that the requisite fact-based motivation has been established, the claimed inventions would not result. *Uniroyal, Inc. v.*

*Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988).* Applicants, therefore, submit that the imposed rejections of claims 1 through 3, 5, 6, 8, 18 and 20 under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama is not factually or legally viable and, hence, solicit withdrawal thereof.

**Claims 4, 7, 9 through 13, 15, 16 and 19 were rejected under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama and Sasuga et al.**

In the statement of the rejection the Examiner again concluded that one having ordinary skill in the art would have been motivated to modify the display of Huang et al. by implementing the stacking technique of Kuriyama, and then to employ the connecting member of Sasuga et al. This rejection is traversed.

Like claims 1 and 4, independent claim 5 is directed to a display apparatus comprising a pixel circuit, a display control circuit, and a supply region, wherein the pixel circuit, the display control circuit and the supply region are stacked such that at least one of a data line transmitting luminance data and a selection line transmitting a write timing signal for the luminance data, which lines are connected to the display control circuit, overlaps with the supply region in a stacking direction. No such structure is disclosed by any of the applied references, including Kuriyama. Simply put, Kuriyama neither discloses nor suggests the concept of stacking a data line transmitting luminance data or a selection line transmitting a write timing signal for the luminance data to overlap with a power supply line. As also previously pointed out, the above argued difference between the claimed invention and the applied prior art is functionally significant in reducing the adverse effect of noise and static electricity on the signals, thereby improving display.

Based upon the foregoing it should be apparent that even if the applied references are combined as suggested by the Examiner, and again Applicants do not agree that the requisite fact-based motivation has been established, the claimed invention would not result. *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, *supra*. Applicants, therefore, submit that the imposed rejection of claims 4, 7, 9 through 13, 15, 16 and 19 under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama and Sasuga et al. is not factually or legally viable and, hence, solicit withdrawal thereof.

**Claim 14 was rejected under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama, Sasuga et al. and Murofushi.**

**Claim 17 was rejected under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama, Sasuga et al. and Hirota.**

Each of the above rejections of claims 14 and 17 under 35 U.S.C. § 103 is traversed. Specifically, each of claims 14 and 17 depend directly or ultimately from independent claim 4. Applicants incorporate herein the arguments previously advanced in traversing the imposed rejection of claim 4 under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama and Sasuga et al. The additional references to Murofushi and Hirota do not cure the previously argued deficiencies in the attempted combination of Huang et al., Kuriyama and Sasuga et al.

Applicants, therefore submit that the imposed rejection of claim 14 under 35 U.S.C. § 103 for obviousness predicated upon Huang et al. in view of Kuriyama, Sasuga et al. and Murofushi, and the imposed rejection of claim 17 under 35 U.S.C. § 103 for obviousness

predicated upon Huang et al. in view of Kuriyama, Sasuga et al. and Hirota, are not factually or legally viable and, hence, solicit withdrawal thereof.

Based upon the foregoing it should be apparent that the imposed objections and rejections have been overcome, and that all pending claims are in condition for immediate allowance. Favorable consideration is, therefore, solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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